

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF OHIO
EASTERN DIVISION**

JAMES HAYDEN,)	Case No. 1:17-cv-02635
)	
Plaintiff,)	Judge Christopher A. Boyko
)	
vs.)	
)	FILED UNDER SEAL
2K GAMES, INC. and TAKE-TWO)	
INTERACTIVE SOFTWARE, INC.,)	
)	
Defendants.)	

DECLARATION OF ANDREW ALEXANDER

1. I, Andrew Alexander, submit this Declaration on behalf of James Hayden (“Mr. Hayden” or “Plaintiff”) in support of Plaintiff’s Motion and Brief in Support to Exclude the Expert Testimony of Dr. Ian Bogost.

2. I am an Attorney at the law firm Calfee, Halter & Griswold LLP.

3. Attached as **Ex. A** to this Declaration is a true and correct copy of Take-Two’s Expert Report and Declaration of Ian Bogost, Ph.D.

4. Attached as **Ex. B** to this Declaration is a true and correct copy of excerpts from the deposition of Dr. Ian Bogost, taken on August 30, 2021.

I, Andrew Alexander, declare under penalty of perjury that the foregoing Declaration is true and correct.

Dated: October 25, 2021

/s/ Andrew Alexander
Andrew Alexander